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11	•		
12	Attorneys for Defendants: MILLENNIUM FUNDING, INC.; BODYGUARD PRODUCTIONS, INC.; UN4 PRODUCTIONS, INC.; HOMEFRONT PRODUCTIONS, INC.; MILLENNIUM MEDIA, INC.; CRIMINAL PRODUCTIONS, INC.; CLEAR SKIES NEVADA, LLC; HUNTER KILLER PRODUCTIONS, INC.; LHF PRODUCTIONS, INC.; RAMBO V PRODUCTIONS, INC.; FALLEN		
13			
14	PRODUCTIONS, INC.; WICKED NEVADA, I	LLC; 211 PRODUCTIONS, INC.; FATHERS &	
15	DAUGHTERS NEVADA, LLC; VOLTAGE DEVELOPMENT NCCF, LLC; HB PRODUCTIONS, INC.; STATUS UPDATE, LLC; STOIC PRODUCTIONS, INC.; COBBLER NEVADA, LLC, SURVIVOR PRODUCTIONS, INC.; TREVOR SHORT; and AVI LERNER		
16			
17	UNITED STATES DISTRICT COURT		
18	DISTRICT OF NEVADA		
19	HURRICANE ELECTRIC LLC,		
20	Plaintiffs,	Case No.: 2:20-cv-01034-JCM-DJA	
21	V.	STIPULATION FOR DISMISSAL WITH	
22	MILLENNIUM FUNDING, INC., et al.	COURT RETAINING JURISDICTION TO ENFORCE SETTLEMENT AGREEMENT	
23	Defendants.		
24			
25	HURRICANE ELECTRIC, LLC ("Plain	ntiff"), through its counsel Neil D. Greenstein and	
26	Joshua M. Dickey, and MILLENNIUM FUNDING, INC.; BODYGUARD PRODUCTIONS,		
27	INC.; UN4 PRODUCTIONS, INC.; HOMEFRONT PRODUCTIONS, INC.; MILLENNIUM		
28	MEDIA, INC.; CRIMINAL PRODUCTIONS, INC.; CLEAR SKIES NEVADA, LLC; HUNTER		

1	KILLER PRODUCTIONS, INC.; LHF PRO	DUCTIONS, INC.; RAMBO V PRODUCTIONS,
2	INC.; FALLEN PRODUCTIONS, INC.; W	VICKED NEVADA, LLC; 211 PRODUCTIONS,
3	INC.; FATHERS & DAUGHTERS NEVADA, LLC; VOLTAGE DEVELOPMENT NCCF	
4	LLC; HB PRODUCTIONS, INC.; STATUS UPDATE, LLC; STOIC PRODUCTIONS, INC.;	
5	COBBLER NEVADA, LLC; SURVIVOR PRODUCTIONS, INC.; TREVOR SHORT; and AV	
6	LERNER ("Defendants"), through their counsel Kerry S. Culpepper and F. Christopher Austin	
7	submit this stipulation for dismissal.	
8	The parties have agreed to a settlement. Pursuant to Federal Rule of Civil Procedure	
9	41(a)(2), the parties request that the Court dismiss this action and all claims and potential	
10	counterclaims subject to the Court retaining jurisdiction to enforce the terms of a written	
11	Confidential Settlement Agreement.	
12	Each party is to bear its own costs and attorneys' fees.	
13	Dated this 27th day of February, 2021.	Dated this 27th day of February, 2021.
14	CULPEPPER IP, LLLC	BAILEY * KENNEDY
15	By: <u>/s/<i>Kerry S. Culpepper</i></u> Kerry S. Culpepper	By: <u>/s/ Joshua M. Dickey</u> Joshua M. Dickey
16	(ADMITTED PRO HAC VICE) 75-170 Hualalai Road, Suite B204	8984 Spanish Ridge Avenue Las Vegas, Nevada 89148-1302
17	Kailua Kona, HI 96740	In Association With:
18	F. CHRISTOPHER AUSTIN WEIDE & MILLER, LTD.	NEIL D. GREENSTEIN (ADMITTED PRO HAC VICE)
19	10655 Park Run Drive, Suite 100 Las Vegas, Nevada 89144	TECHMARK 1751 Pinnacle Drive, Suite 1000
20	Attorneys for Defendants	Tysons, Virginia 22102 Attorneys for Plaintiff
21	Altorneys for Defendants	Hurricane Electric LLC
22		IT IS SO ORDERED:
23		II IS SO ORDERED.
24		Xellus C. Mahan
25		UNITED STATES DISTRICT JUDGE
26		
27		Dated: March 3, 2021

CULPEPPER IP, LLLC 75-170 HUALALAI ROAD SUITE B204 KAILUA-KONA, HAWAII 96740 (808) 464-4047

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